

FISCAL YEAR 2016-17 WORK PLAN
Superfund Support Agency Cooperative Agreement (SACA)- Management Assistance Grant (MAG)
Navajo EPA- Navajo Superfund Program

SECTION I - INTRODUCTION

The Navajo Nation Environmental Protection Agency (NNEPA) is the designated authority for all activities within or affecting the Navajo Nation relating to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

SECTION II - FINANCIAL ASSISTANCE REQUEST

A. Grant Funding for Fiscal Year ("FY") 2016 - 17

The Navajo Nation is requesting for continued financial assistance from the United States Environmental Protection Agency (EPA) Region 6 under its existing SACA-MAG in the amount of \$39,371 to carry out activities during the period May 28, 2015 to September 30, 2017 for the Prewitt Abandoned Refinery (PAR) Superfund Site and the United Nuclear Corporation (UNC) Uranium Mill Superfund Site, as outlined on the following pages. The budget is outlined in Attachment A as itemized in the Tribal format for each Superfund site.

B. Previous SACA-MAG Grants

The Navajo Nation EPA Superfund (NSP) has received FY08 (5/28/08) through FY14 grant funds in the amount of \$56,098 from U.S. EPA, Region VI. The following list chronicles the annual SACA-MAG grants received by the Navajo Nation (Last award letter beyond FY14 was received by NNOMB only, thereby never placed):

FY FY08 to FY10 - \$15,000
FY 11 - \$5,000
FY 12 - \$10,000
FY 13 - \$15,000
FY 14 - \$11,098

C. Past Accomplishments

Under the SACA-MAG, NSP achieved the following accomplishments:

- Coordinated with USEPA in obtaining pertinent information and commentaries from public, tribal entities and local residents on proposed projects, scope of work, remedial activities and investigations, feasibility studies; reclamation plans, endangerment assessments, groundwater monitoring data, permits, quarterly reports, record of decisions, groundwater corrective action data analysis reports, remedial design plans and methods and the Supplemental Feasibility Studies for both NPL sites.
- Provided input to proposals or amendments to all work plans, remedial reports, permits, licenses, and right-of-ways on behalf of the Navajo Nation for both NPL sites.
- Conducted joint and cooperative on-site visits, on-site inspections, and on-site monitoring, and on-site training of NSP staff regarding significant activities performed by USEPA at both sites.
- Collaborated with the New Mexico Environment Department (NMED) and other Navajo Nation entities in evaluating data and information on specific releases of hazardous substances into the environment, and on groundwater analytical data which are present at both the PAR and UNC sites.
- Conducted Public Outreach throughout the Navajo Nation and to the communities affected by the NPL site activities. Several community meetings took place during FY03 and FY04 in the Church Rock Chapter and surrounding communities regarding conductance of their own environmental studies for housing

developments and other private projects proposed in the vicinity of the UNC Church Rock NPL site. NSP coordinated several meetings to accommodate presenters.

- Provided input and comments to proposed federal legislation and related Superfund site activities, Supplemental Feasibility Studies (SFS), and other pilot projects for use of current and available technology.
- Assisted USEPA in the Cost Recovery effort for both NPL sites and established a time allocation system for personnel on the SACA grants.
- Assisted USEPA in conducting Public Meetings to discuss findings for the first two Five-Year Reviews for both NPL sites.
- Notified USEPA on change of NSP personnel for oversight of the NPL sites, the PAR and UNC sites, through teleconferencing with the USEPA Region 6 Superfund Budget and Contract Section to inform that 1) Eugene Explain, Health Physicist, will be responsible as Ms. Diane Malone has been promoted, and 2) Ms. Vena J. Webb, Project Officer, has the responsibility of the SACA-MAG Region 6 oversight as Ms. Gibson was promoted and is now Ms. Webb's supervisor.
- Downloaded, for both sites, from USEPA's Region 6 website up-to-date informational documents, e.g., fact sheets and five-year review reports, and retrieved site files that Ms. Malone had transferred to become familiar with the sites.
- Received approval from Ms. Webb to extend the grant period from its current May-to-April cycle to the October-to-September cycle through a no-cost extension from May 2009 to September 2010 that was signed on March 18, 2009.
- Met with Region 6 staff and discussed pertinent grant matters and remedial project management for the PAR and UNC sites; On April 8, 2009, NSP staff (Health Physicist, Environmental Program Supervisor, and Sr. Office Specialist) met with USEPA staff regarding 1) Budget and Contract Section where discussions occurred with Ms. Vena J. Webb, Project Officer, and Ms. Kathy Gibson, Supervisor, on the SACA/MAG oversight responsibilities, granting of Budget Transfer for training on monitoring well construction for the UNC site, and clarification of NN financial budget sheets, 2) PAR site where discussion occurred with Mr. Sai-ram Appaji, RPM for the site, and 3) UNC Mill/Tailings Site where discussions occurred with Mr. Mark Purcell, Remedial Project Manager (RPM) and Mr. Jason McKinney, Community Involvement Coordinator (CIC).
- Met on December 2, 2009 and participated in a meeting in Albuquerque, NM with office and legal personnel from EPA R-6, NMED, and El Paso Natural Gas Company (EPNG) to discuss 1) the upcoming third five-year review report on the PAR site (NMED to generate report); 2) the possibility of a technical infeasibility (TI) waiver to the site's Record of Decision; 3) the focused feasibility study to re-look at the site's applicable or relevant and appropriate requirements and other data gaps; and 4) clarifications on the EPNG response letter (September 2009) to EPA's 2007 comment letter on proposed site actions.
- Interviewed by USEPA Region 6 was the former NSP contact person (Diane J. Malone) regarding NPS's past and continuing involvement in site activity
- Attended the Grants Mineral Belt Partnership meeting in Albuquerque, NM where discussions centered on the option being considered in USEPA-R-9's Engineering Evaluation and Cost Analysis (EE/CA) document, which will have wastes from the Northeast Church Rock (NECR) mine site transferred to the UNC site. In attendance were representatives from USEPA-R6/R9, U.S. Bureau of Land Management, New Mexico Environment Department (NMED), U.S. Nuclear Regulatory Commission (NRC), and the U.S. Geological Society.
- Assisted USEPA Region 6 Staff, Mr. Purcell and Mr. McKinney, in setting up the public meeting on May 5th by going before Pinedale Chapter's planning committee to request use of the facility and providing pertinent information for the meeting purpose.
- Attended the May 5th public meeting at the Pinedale Chapter house regarding updates of the UNC site. In addition to USEPA-R6 staff, several representatives from Region 9, NRC, and NMED were in attendance.
- Participated in teleconferences and meetings regarding the option of UNC being seriously considered for use as a repository for wastes from the NECR mine site. This option comes out of USEPA-R9's EE/CA document for the NECR site which was reviewed and commented on.
- Attended from June 16 to 18, 2009 the training course entitled Applied Hydrologic Site Characterization and

Monitoring Well Construction at Oakland, CA sponsored by Environmental Outreach and Stewardship Alliance. This helped initiate review of UNC's Annual Review Report-2008, Groundwater Corrective Action, Church Rock Site, Church Rock, New Mexico. It will also help in the eventual review of the UNC's semi-annual (July-December 2008) Groundwater Effluent and Environmental Monitoring report and Groundwater Quality Assurance report.

- Provided a tour for approximately 20 students from Northern Arizona University (NAU) that was coordinated with NAU's Matthew Zierenberg and consisted of providing information on the UNC spill and associated areas, i.e., breached dam, mill, nearby residences, and UNC's Northeast Church Rock (NECR) mine areas; Insight was provided to the students on the problems associated with uranium mining, types of facilities associated with mining, and impacts from mining activities.
- Met on October 27, 2009 with Larry Bush of UNC to update each other on the discussions that are occurring on the possibility of the use of the UNC site cells as repository for radiological wastes from the GE's (UNC's parent company) NECR mine site. The NECR site is approximately a mile west of the UNC site.
- Attended on November 3-5, 2009 a workshop for stakeholders impacted from past uranium mining and related activities in Gallup, NM. Workshop breakout sessions and a follow-up roundtable discussion on impact issues were attended.
- Participated in a conference call on 4/12/10 with Mark Purcell (EPA R-6), Yolande Norman (NRC)), Earle Dixon (NMED), and GE/UNC representatives and discussed NMED's 13 questions/concerns regarding the proposed installation of a pilot injection well to determine the locations of an additional array of injection wells, which is aimed at arresting the contaminated groundwater plume and channeling it to the extraction wells; Same topic was discussed at the annual UNC meeting on June 9th in Albuquerque, NM.
- Submitted quarterly reports as progress reports to USEPA on a quarterly basis that included itemized expenditure reports.
- Submitted annual work plan and budget for each grant term.
- Staff completed review of a) UNC's 247-page document entitled *NECR Site Removal Action, Pre-Design Studies Work Plan, Church Rock Mill Site* (dated 8/16/13), b) UNC's 161-page document entitled *NECR Site Removal Action, Pre-Design Studies Work Plan, NECR Mine Site* (dated 8/16/13), UNC's 101-page document entitled *NECR Site Removal Action, Pre-design Studies Sampling and Analysis Plan, Vol. III Quality Assurance Project Plan* (dated 8/30/13), d) UNC's 315-page document entitled *NECR Site Removal Action, Pre-design Studies Sampling and Analysis Plan, Vol. IV Health and Safety Plan* (dated 9/6/13), and e) EPA Region 6's 245-page document entitled *Fourth Five-Year Review Report for the UNC Superfund Site* (dated 9/2012).
- Staff participated in monthly TASC-sponsored conference calls with Red Water Pond Road to hear issues and updates on ongoing projects.
- Staff in reviewed a) NECR's Near Term Deliverables -Proposed Consolidation Evaluation dated 6/25/14 and received 7/7/14. Proposal contained in 11 page letter, b) NECR/UNC Pre-design Study Report Draft for Mine Site dated 7/21/14 and Mill Site dated 7/17/14 and both received 7/18/14, c) Natural Analog Study Report – Supplement to Pre-design Studies Report, Mill Site dated 8/20/14 and received 8/22/14.
- Staff provided information to the Standing Rock Chapter Officials on July 1, 2014 and to the Standing Rock Chapter community on July 8, 2014 and to the Coyote Canyon Chapter Officials on August 3, 2014 and to the Coyote Canyon Chapter Community on August 7, 2014. Information centered on the plan to place Sentinel (Sentry) Wells in their communities after access agreements and NN Permits are obtained. The wells are for the purpose of detecting the UNC contaminated plume migrating underground in a northward direction from Section 36 toward Navajo land. Sentinel wells maybe placed in three Chapter locations, Pinedale Chapter, Standing Rock Chapter, and Coyote Canyon Chapter. The Pinedale Chapter had been previously made aware of UNC activities, including the plan to place Sentinel wells.
- NSP staff reviewed several documents, participated in stakeholders' teleconferences and meetings, reviewed electronic mails amongst the EPA R-6 & R-9, NMED, NRC, GE/UNC, and TASC staff, and provided outreach to

two Chapter communities.

- Monitoring of subsurface contaminants continues. No additional information has been provided in regard to the additional monitoring wells spoken of at last year's meeting.

SECTION III - NEED FOR FINANCIAL ASSISTANCE

The U.S. EPA Region VI and the Navajo Nation through the NSP entered into a SACA to coordinate the Navajo Nation's involvement in remedial activities at the PAR and UNC sites, which lie adjacent to Navajo Nation lands. Financial assistance will continue to assure Navajo Nation's meaningful and substantial involvement in response activities taking place at the PAR Site in Prewitt, NM, and the UNC Site in Church Rock, NM, as per 40 CFR 35.6240.

Under this Cooperative Agreement, NSP will continue to provide assistance to the lead agency, U.S. EPA Region VI, with input to review of data, documents, and comments, and in providing other requested assistance, as described in 40 CFR 35.6015 (a)(49). NSP will also continue to coordinate the involvement of the Navajo public and communities by providing public meetings and updates of activities carried out by the Responsible Parties (RP) under the oversight of the U.S. EPA. The two superfund sites are as follows:

A. Prewitt Abandoned Oil Refinery Site (PAR)

Background:

The PAR Site lies immediately outside the town of Prewitt, New Mexico. The Site contained the ruins of the refinery, including waste pits; an oil/water separator, tank bases and other equipment rubble, two major spill areas, and the remains of a pump lift station. The Site began operations in 1938 and was shut down in 1957. The Navajo Nation owned the property from 1966 until the land exchange was finalized with the RPs in 1993.

Following a citizen complaint, tests conducted in 1986 revealed benzene, xylene, lead, and chromium in sediments collected on site. Further investigation in 1987 indicated contamination of groundwater north and east of the Site and the presence of floating layers of non-aqueous phase liquids (NAPL). Groundwater and soils sampled during the Remedial Investigation demonstrated the need for remediation of 1) contaminated groundwater plumes within, north and east of the Site, 2) NAPL in groundwater within, north and east of the Site, 3) the West Pits area and hydrocarbon-contaminated soils within the Site, and 4) asbestos- and lead-contaminated soils within the Site.

The Record of Decision (ROD) was issued in December 1992, and the Remedial Design Work Plan was finalized. Remedial action activities for surface media have been completed, and the surface portion of the Site is deleted from the NPL. The remedial actions selected by USEPA in the ROD for Site subsurface media included two components: soil vapor extraction of NAPL and ground water extraction, treatment, and reinjection. Because of the significant risk of spreading NAPL by pumping ground water outside the NAPL source areas, the subsurface remedy was implemented in phases. Phase I was the initial sampling and analysis phase with remediation expected to be completed in 2001. The phase II activities were conducted to resolve outstanding issues and to fill data gaps remaining at the conclusion of Phase I that began in 1998 but was suspended in 2000.

USEPA prepared a First Five-year review report in 2000, the Second Five-year Review in 2005, and the Third Five-year for 2010. The Second Five Year Review found that the remedy is protective in the short term. The Third Five Year Review found the same. The Fourth Five-year report found the same to which comments will be provided. Institutional Controls were required for long-term. The site will continue to be evaluated for progress and the next Five Year Review is set for 2015. Navajo Superfund will continue to participate in the review and comments on the Supplemental Feasibility technical documents along with coordination of public meetings for this NPL site.

B. United Nuclear Corporation (UNC) Site

Background

The UNC site is located approximately 17 miles northeast of Gallup, New Mexico. The Site consisted of a uranium mill complex and tailings disposal ponds situated adjacent to the Pipeline Arroyo, and covers an area of about 125 acres. The UNC mill operated from 1977 until 1982, and extracted uranium concentrates from ore with use of an acid leach process that produced wet, acidic tailings.

The UNC Site was placed on the US EPA's NPL in 1983 because of seepage from the tailings and off-site migration of radiological and chemical constituents in the groundwater. The EPA implemented a Remedial Investigation (RI) and Feasibility Study (FS) in March 1984 with the RI field activities being conducted from March 1984 through August 1985. The objectives of the RI field activities were to determine the nature and extent of groundwater contamination in the three shallow formations at the site. These are the Southwest alluvium, Zone 1, and Zone 3 of the Upper Gallup Sandstone. Each shallow zone has very specific hydro geological and hydro-geochemical characteristics associated with it.

The EPA selected extraction of contaminated water and evaporation of the extracted water as the remedy in the ROD that was signed in September 30, 1988. NMED and the Navajo reviewed and commented on the ROD. The remedy incorporated the corrective action previously required by the NRC under the License and added a requirement for corrective action in the Southwest Alluvium. The EPA's recommended cleanup standards for the groundwater were presented in the ROD and were incorporated into the NRC license.

Initial corrective action addressed the groundwater concern, which began with tailings seepage investigations and neutralization of the acidic tailings. These actions were performed from 1979 through 1982. Tailings neutralization included the addition of ammonia and lime to the tailings. NMED also required that UNC implement corrective action for ground water in Zone 1 and 3 formations. This correction action, which began in 1982, consisted of installing and operating wells to extract tailings seepage, neutralizing the extracted water, and discharging the neutralized water into the tailings impoundments. The groundwater corrective action required by the NRC license and the ROD was implemented beginning 1989, which included reclamation of the tailings impoundment area and was completed in 1996.

The corrective action systems for tailings seepage remediation are currently in operation to include the Hydrofracting Pilot Project to evaluate other remedial alternatives requirements under section 121 (d) of CERCLA, 42 USC 9621(d). UNC also submits annual review reports at the end of each subsequent year. These reports include water quality analyses and water level elevations for each quarter to include pump results and summaries of operation of the corrective action systems and description of medications made to the systems during the operating year.

The NRC determined Finding of No Significant Impact based on an Environmental Assessment. NSP had not submitted comments, as the person responsible passed on. A gap in time existed and NSP was not given the opportunity to catch up. NSP has required the installation of Sentinel Wells on the Navajo Nation to capture the underground plume migrating northward from the UNC site. The four surrounding Chapters were notified of the upcoming installation project. A site walk on the Navajo Nation was the next step to identify potential locations for the wells. It has not yet occurred.

NSP staff participated in several meetings that took place in FY 2008 - FY2014 that affect the operation of the corrective action systems. FY08 ongoing activities include the Zone 3 Remedial efforts, background evaluation for radium and uranium, and technical impracticability (TI) Evaluation and Supplemental Feasibility Study. NSP staff participated in several technical meetings with the regulatory agencies and the RPs.

SECTION IV – The Two Year FY 2016 – FY2017 SACA Grant Activities

NSP submits the Work Plan which details the foreseeable activities of the NPL sites to meet the objectives. The Health Physicist with administrative support of the Environmental Program Supervisor, the Sr. Office Specialist, and the GIS Analyst, acting on behalf of the Navajo Nation, will carry out the commitments detailed under this Work Plan. Tasks outlined are as follows:

A. UNC Site:

1. NSP will continue their technical capacity through on-the-job training.
2. NSP will continue to review the following:
 - a. On January 30, 2009, NSP received UNC's Annual Review Report-2008, Groundwater Corrective Action, Church Rock Site, Church Rock, New Mexico, which was dated January 2009 and generated by Chester Engineers (CEI) of State College, Pennsylvania for submittal to USEPA Region 6 and the U.S. Nuclear Regulatory Commission (NRC).
 - b. On February 2009, NSP received UNC's semi-annual (July – December 2008) Groundwater Effluent and Environmental Monitoring report and Groundwater Quality Assurance report. The reports generated by UNC are submittals to NRC pursuant to conditions under its NRC source materials license and to USEPA for the Administrative Order condition.
 - c. The site's 150-page third 5-year review (dated September 2008), which includes appendices and was generated by USEPA.
 - d. The site's report titled "Revised Submittal of Background Statistics with Comparisons Values UNC Church Rock Mill and Tailing Site, Church Rock New Mexico." As time permits, this is to be ongoing on the assumption that additional detailed discussion will probably occur again between EPA R-6, NNEPA, and/or General Electric, Incorporated (GE).
 - e. The site's report titled "Second Five-Year Review Report for the United Nuclear Corporation, Groundwater Operable Unit, Church Rock, McKinley County, New Mexico, September 2003" in support of the third 5-year review.
2. NSP will participate in the ongoing Site-Wide Supplemental Feasibility Study (SWSF) that is ongoing.
3. Navajo Nation (NNEPA and NNWD) will continue to be involved in decision-making of the implementation of Institutional Controls (IC) such as a Deed Restriction through governmental controls, enforcement, and permitting and monitoring of well drillings. Assistance to US EPA will be provided at public meetings. The Navajo Nation (as a local government) through this funding will evaluate the Institutional Controls (IC) (zoning restrictions, ordinances, statutes, permits or any existing provision that restrict land or resource use at the site) and determine if any control measures are available and applicable. This task will include close working relations with the Bureau of Indian Affairs for Allotment Parcels. Through this evaluation, enforcement or permit tools with the IC component may be negotiated or developed. Several meetings with participating agencies will occur to assist USEPA. From last year's interactions with stakeholders, it is known with them that a NNEPA representative will be participating in the USEPA contractor's revision of the UNC SWSF. Some participation has already occurred with input at meetings and in teleconferences. There is a good possibility that field trip(s) will be part of this participation.
4. NSP will continue to participate in the review and comments of the documents and staged implementation of the proposed plan to drill a pilot well in Zone 3 for injection testing to construct an array designed to create a hydraulic barrier and later potentially a geochemical barrier to arrest migration of tailings seepage from tailings pond (proposal was drafted by CEI for UNC); Coordination via teleconferences with the EPA R-6, NMED, NRC, CEI, and GE/UNC on an alternative effort to arrest contaminant migration in Zone 3 will continue; Further, review and comments will occur of remedial activities and Southwest Alluvium monitoring program reports, of the background evaluation for Radium and Uranium Findings and Reports, of the

Technical Impracticability Evaluation Reports, of the Supplemental Feasibility Study (SFS) or ROD Amendments; Additionally, NSP will attend technical meetings with the SIS review teams.

5. NSP will continue to participate in review of the Surface Operable Unit Proposed Plan that was presented at two Public Hearings on August 29th and 30th, 2012, as the preferred alternative for On-Site Disposal at the United Nuclear Corporation Site within the Tailings Disposal Area.
6. NSP will continue coordination with the EPA Region 9 staff as NSP is tracking remedial/removal activities occurring at the NECR site; Updates will be provided at USEPA Region 9's quarterly meetings. Additional discussions will occur between EPA, NNEPA, and GE regarding use of UNC cells as a repository location for NECR wastes.
7. NNEPA representative will have oversight responsibilities to observe and provide input on all field activities, including the Sentinel Wells. Discussion inputs of observation will occur during teleconferences, at technical annual meetings, and meetings at the NSP office, Church Rock Chapter house, UNC office, and/or on-site. If stakeholders give an update to Church Rock Chapter, NSP staff will be there at the meeting(s).

B. PAR Site:

1. NSP's staff will enhance their technical capacity through on-the-job training.
2. NSP will be reviewing the 90-page Fifth Five-Year Review Report for the Prewitt Superfund Site, Prewitt, New Mexico.
3. NSP will continue to participate in the review and comments of related technical and analytical documents such as those related to: a) groundwater monitoring that is performed to verify that groundwater is contained and not migrating off-site, and b) evaluation of benzene, toluene, ethyl benzene, and xylene (BTEX) concentration trends in groundwater for Alternative Remedial Strategy (ARS) evaluations that may or may not include a TI waiver.
4. NSP will participate in the review and comments of the site's fifth five-year review report which is being generated by NMED.
5. NSP will participate in the review and comments of the proposal to install additional monitoring wells that will better define the contaminant plume periphery.
6. NSP will biannually coordinate public meetings to update the community regarding the progress of this site.
7. NSP will assist USEPA in conducting Public Meetings to discuss findings of the fifth Five Year Reviews when scheduled.
8. NNEPA representative will have oversight responsibilities to observe and provide input on all field activities. Discussion inputs of observation will occur during teleconferences, at technical annual meetings, and meetings at the NSP office, Baca Chapter house, and/or on-site. If stakeholders give an update to Baca Chapter, NSP staff will be there at the meeting(s).

C. Grant Oversight and Administration

1. Continue to provide grant oversight and budget administration for both sites:
 - Attend NSP and Waste Regulatory Compliance Department (WRCD) meetings to keep management abreast of UNC and PAR activities,
 - Develop, and submit processed quarterly reports, end-of-year reports for activities of the both grants,
 - Prepare and process, through the NN Signature Authorization System (SAS), the SACA Fiscal Year grant application packages for submittal to U.S. Region VI,
 - Review technical reports and attend program, department, and USEPA meetings and public meetings pertinent to the Superfund sites. Discussions at quarterly meetings will begin when scheduled. These meetings may be held in conjunction with the technical meetings mentioned above when possible,
 - Procure and process for required supplies, travel, communication & utilities, medical monitoring, training, certification, and insurance costs.

Deliverables:

- Three Quarterly reports submitted 30 days after the quarter ends along with expenditure reports.
- One End of Year report with expenditures reports
- Reports on public meeting or technical meetings to be submitted with the Quarterly reports.
- Copies of the comments made on technical documents or analytical documents prepared by staff and submitted with the Quarterly reports

D. Staff Development and Training

- 1) New and assigned staff under NSP-SACA will attend meetings, trainings if funds are available, and conferences that will aid in completing tasks under this grant.

E. Technical and Public Meetings

1. Meetings:
 - a. Conduct two (2) public meetings at each site which is a total of 4 meetings for the communities affected by the superfund sites and attend Navajo Nation Chapter meetings to provide outreach to Navajo communities on NPL site activities, and assist the U.S. EPA in educating the Navajo public about remedial activities at the sites.
 - b. Attend technical meetings with the U.S. EPA, the NRC, El Paso Natural Gas (EPNG), Atlantic Richfield Company (ARCO), United Nuclear Corporation (UNC), their contractors, the NMED, U.S. Army Corp of Engineers (USACE), and other entities as appropriate to represent the Navajo Nation by addressing public health and environmental impacts from past uranium mining and continue participation in the development of the Five-Year Plan for Uranium Legacy issues.
2. Review of Technical Documents:
 - a. Assist the U.S. EPA in obtaining information from all relevant sources, including departments and divisions within the Navajo Nation government, to allow ongoing Remedial Action activities to proceed immediately.
 - b. Attend quarterly sampling events; oversee the installation of additional monitoring wells, if needed; and oversee any other ground-disturbing activities carried on by the RP, U.S. EPA, or their contractors. Review quarterly groundwater quality analyses and other chemical data analyses as requested. Activities will be limited to oversight responsibilities to observe and provide input such as comments and recommendations for discussion with stakeholders.
3. Technical Support:
 - a. Provide support in generating maps and location points (GPS). Input and manage site information. Orientate on the GIS information for each site.

Deliverables

- 1) Copy of Agenda for public meetings
- 2) Public Notices for public hearings or public meetings
- 3) Technical comments made by other Navajo Nation Technical staff.

SECTION V - NAVAJO SUPERFUND PROGRAM STAFFING

This two year work plan will be implemented by NSP staff who are presently employed by the Navajo Nation and who possess the technical, administrative, and managerial skills to successfully accomplish all the proposed work plan activities. The program staffing for FY 2016 - 17 under SACA will be a) The NSP Health Physicist who will oversee the USEPA Region 6 MAG project activities and will participate in the monitoring activities performed at the PAR and UNC sites (FTE .06 = 96 hrs for UNC & 42 hrs for Prewitt per year), b) Freida S. White, NSP Program Supervisor, who will oversee all activities such as management of field and office activities for the PAR and UNC sites in addition to attending related meetings and generating the

budget, work plan, and Quarterly Reports (FTE .03 = 42 hrs for UNC & 21 hrs for Prewitt per year), c) The Sr. Office Specialist who will perform administrative activities such as generating and processing timesheets, Travel Authorizations, Personnel Action Forms, attending grant meetings for the PAR and UNC sites, and activities normally handled by the Accounting Clerk such as supply purchasing, as needed budget transfers, reconciliation of cost, and participating in budget meetings for the PAR and UNC sites (FTE .03 = 42 hrs for UNC & 21 hrs for Prewitt), and d) Darlene Jenkins, Sr. Geographical Information System Analyst, who will provide support in generating maps and location points (GPS), input and manage site information, and orientate on the GIS information for each site.

Other NSP staff to participate will possibly be the Sr. Environmental Engineer, Chandra Manandhar, and the Chemist, currently a vacant position. Their hours are supported by other grants.

NSP staff will consist of ten individuals in FY16-17, including one IPA. Currently, there are seven individuals with three to be hired. NSP is within the NNEPA Waste Regulatory Compliance Department (WRCD). With escalation of activities and its expectation to increase for the UNC and PAR sites, funds and hours have increased. Other technical members to review and assist with the two projects will be reimbursed for travel when they attend technical meetings; and, expenditures will be included in the cost recovery program for both NPL sites. The participating technical review members to be traveling will be representatives from the Navajo Water Division, NNEPA Administration, NSP, and the Navajo Department of Justice if needed.

NO TABLE OF TASKS REQUIRED; FTE HRS ARE AS NOTED ABOVE

ENCLOSURES

NNEPA Superfund Budgets:

- 1) UNC Budget Forms 1-6**
- 2) PAR Budget Forms 1-6**